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Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

JIHONG WU,

Plaintiff,

v.

KRISTI NOEM,<sup>1</sup> Secretary of the United States  
Department of Homeland Security, *et al.*,

Defendants.

Case No. 4:25-cv-00755 HSG

**STIPULATION TO STAY PROCEEDINGS;  
ORDER**

The parties, through their attorneys, hereby stipulate and respectfully request the Court to stay proceedings in this case for a limited time, until September 17, 2025. The parties make this joint request because they are pursuing an administrative resolution that may render further litigation of this case unnecessary.

1. Plaintiff filed this action seeking adjudication of her Form I-589, Application for Asylum and Withholding of Removal. United States Citizenship and Immigration Services (“USCIS”) scheduled an interview for May 20, 2025. USCIS will work diligently towards completing adjudication of the I-589 application, absent the need for further adjudicative action or unforeseen circumstances that would

<sup>1</sup> Kristi Noem is automatically substituted as the defendant in this matter in accordance with Federal Rule of Civil Procedure 25(d).

1 require additional time for adjudication.

2       2.       Plaintiff agrees to submit all supplemental documents and evidence to USCIS seven to  
3 ten days prior to the agreed upon scheduled interview. Plaintiff agrees that failure to timely submit this  
4 evidence may result in the rescheduling of the interview at no fault of USCIS.

5       3.       If needed by Plaintiff or her dependent(s), Plaintiff shall bring her own interpreter to her  
6 asylum interview. See [https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-](https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-provide-interpreters-starting-sept-13)  
7 [provide-interpreters-starting-sept-13](https://www.uscis.gov/newsroom/alerts/affirmative-asylum-applicants-must-provide-interpreters-starting-sept-13). Plaintiff recognizes that failure to bring an interpreter to her  
8 interview may result in the interview being rescheduled at no fault of USCIS.

9       4.       Upon receipt of the Asylum Office's decision, Plaintiff agrees to voluntarily dismiss the  
10 case.

11       5.       The parties agree to bear their own litigation costs and attorney fees.

12       Accordingly, the parties stipulate and request that the proceedings in this case be stayed until  
13 September 17, 2025, at which time the parties will file a joint status report with the Court. At that time,  
14 the parties may request a further continuance of the stay of proceedings, dismissal of the litigation if  
15 appropriate, or placement of the case back on the Court's active docket. A stay of proceedings in this  
16 case will benefit the parties and conserve the Court's resources while the parties pursue a potential  
17 administrative resolution.

18 Dated: March 26, 2025

Respectfully submitted,<sup>2</sup>

19 PATRICK D. ROBBINS  
20 Acting United States Attorney

21 /s/ Elizabeth D. Kurlan  
22 ELIZABETH D. KURLAN  
23 Assistant United States Attorney  
24 Attorneys for Defendants  
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27 <sup>2</sup> In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all  
28 signatories listed herein concur in the filing of this document.

1 Dated: March 26, 2025

/s/ Zhenxiong Fan  
ZHENXIONG FAN  
Attorney for Plaintiff

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7 **ORDER**

8 Pursuant to stipulation, IT IS SO ORDERED.

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10 Date: 3/26/2025

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HAYWOOD S. GILLIAM, JR.  
United States District Judge  
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